

Schulman & Kaufman, LLC

Attorneys at Law
One Charles Center
100 N. Charles Street, Suite 600
Baltimore, Maryland 21201

Howard J. Schulman
Joseph S. Kaufman

Daniel P. Doty

Tel. (410) 576-0400
Fax: (410) 576-0544

February 16, 2007

VIA ECF

The Honorable Marvin J. Garbis
United States District Court
for the District of Maryland
101 W. Lombard Street
Baltimore, MD 21201

RE: Cephus M. Murrell, et al. v Mayor & City Council of Baltimore
Case No.: MJG-01-CV-3560

Dear Judge Garbis:

Plaintiffs and the City Defendants request that the discovery deadline, which is presently March 1, 2007 (Paper No. 33), be extended for 45 days (until April 17, 2007) and, correspondingly, that the summary judgment motions deadline be extended until May 16, 2007 and the deadline for scheduling a telephone conference in the event no summary judgment motion is filed be extended until May 23, 2007. The parties believe, however, that they will have sufficient information for the settlement conference by the presently-scheduled date (February 27, 2007) and, therefore that it need not be rescheduled.

In light of the City's position that damages should be measured by the diminution in value to the properties caused by the demolitions, Plaintiffs have retained an additional expert, Paul Lee, a real estate appraiser, whose report is not yet complete. Similarly, the City is still considering naming an additional expert(s) to address other claimed damages by Plaintiffs. The parties still need to schedule depositions of the experts, and the City may want to schedule depositions, if possible, of some of Plaintiffs' employees. Plaintiffs did not receive the City's expert appraiser report until recently, and has not yet provided the City with an updated architect's report of Derrick Burnett. In addition, Plaintiffs recently propounded interrogatories to the City, whose response is not yet due.

The parties believe the additional discovery is necessary and that there is not sufficient time under the present scheduling order in which to complete this discovery.

Honorable Marvin J. Garbis
February 16, 2007
Page 2 of 2

Thank you.

Very truly yours,

/s/
Daniel P. Doty

cc: Mr. Cephus Murrell